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Cc: Borkovich, John@Waterboards[John.Borkovich@waterboards.ca.gov]
From: Habel, Rob@DOC
Sent: Tue 6/2/2015 7:51:18 PM
Subject: Elk Hills Aquifer Exemption
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David:

As you recall, the Division sent the US EPA a data package for the Elk Hills field regarding the potential aquifer exemption for the Tulare zone. In the months that have followed there have numerous meetings with the State and Regional Water Boards, along with meeting with the operator injecting into the formation. Originally we were looking at one large package to cover the entire field, and after several meetings and additional research, we feel that the package should be broken up into different applications. The geology and hydrology in the area appears to have allow us the opportunity to evaluate three separate areas. All, or none of these may get to a point where the State is comfortable with submitting an application to the US EPA. These separate areas have unique challenges and will not necessarily be on the same timeline. The operator and the state may want to push one through at a time, both to provide a pilot project to make it through the system, and also so that we are not holding up field activity waiting for the other section's evaluations to be completed. I was hoping to get some feedback from the US EPA on this approach. Please let me know your thoughts before the State gets too far along.

Thanks,

Robert S. Habel, Technical Services Manager

Division of Oil, Gas, and Geothermal Resources

California Department of Conservation

Natural Resources Agency

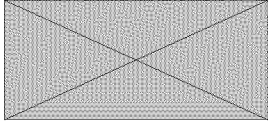
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